



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

VICTORIA GABRIELA RODRIGUEZ-MORALES,
aka Vicky
aka Gaby Morales
aka Pílon_Gaby
Defendant.

INDICTMENT

Criminal No. 23-

435 (PAD)

VIOLATIONS:
18 U.S.C. § 875(c)

THIRTEEN COUNTS

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. At all times material, Instagram was a free-access social networking service operated by Meta Platforms Inc, a company headquartered in Menlo Park, California. Instagram is accessible through its website and its mobile application. Each Instagram account has a profile page where users can share content they create. These posts can be viewed either by the general public or only the user's followers, depending on privacy settings. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Instagram also allows users to broadcast live video from their profiles. Instagram's messaging service allows users to send private messages to select individuals or groups.

2. At all times material, Facebook was a free-access social networking service operated by Meta Platforms Inc, a company headquartered in Menlo Park, California. Facebook is accessible through its website and its mobile application. Facebook users can use their accounts to share communications, news, photographs, videos, and other information

with other Facebook users, and sometimes with the general public. Facebook users can use Facebook Messenger to communicate with other users via text, voice, video.

3. At all times material, Google was a company headquartered in Mountain View, California, that offered online services, including a search engine, a web browser, email (called Gmail), cloud storage, digital payments, mapping services, among others. These services can be accessed through a web browser or mobile applications.

4. At all times material, Puerto Rico Telephone Company d/b/a Claro Puerto Rico (Claro), was a cellular, telephonic, and internet service provider headquartered in San Juan, Puerto Rico. Claro provides cellular communications service to the public. Claro customers can connect to the internet using the Claro's network and their Smart phones and other internet-capable mobile devices.

5. At all times material, Kick.com, Inc. (Kick) was a company based outside of Puerto Rico with a website that allowed users to live stream videos. Kick includes a chat feature that allows users to publicly post comments for others to see.

6. At all times material, VICTORIA GABRIELA RODRIGUEZ-MORALES resided and was in the District of Puerto Rico.

7. At all times material, Uvalde was a city in the state of Texas.

8. At all times material, the Uvalde Consolidated Independent School District (UCISD) operated elementary and secondary schools servicing the children of Uvalde, Zabala, and Real counties in the state of Texas.

9. At all times material, Instagram, Facebook, Google's Gmail, Claro, Kick, and Apple iPhones were means and instrumentalities of interstate and foreign commerce.

COUNTS ONE TO THIRTEEN
Threatening Interstate Communications
(18 U.S.C. § 875(c))

The allegations contained in paragraphs one through nine above are incorporated by reference as if fully alleged herein.

Beginning no later than May 20, 2023, and continuing until on or about October 28, 2023, in the District of Puerto Rico, the defendant,

VICTORIA GABRIELA RODRIGUEZ-MORALES,
aka Vicky, aka Gaby Morales, aka Pilon_Gaby

did knowingly and willfully transmit in interstate and foreign commerce from the Commonwealth of Puerto Rico to State of Texas and to other locations, communications containing threats to injure the person of another. All in violation of 18 U.S.C. § 875(c).

Count	Date	Communication Method	Recipient	Threat
1	On or about May 21, 2023	Instagram Account @pilon_gaby	City of Uvalde	<i>I will haunt everyone from class 2022 to 2023 Each and every single one of y'all will die in the name of Salvador</i>
2	On or about May 21, 2023	Instagram Account @pilon_gaby	Uvalde Police	<i>I will haunt everyone from class 2022 to 2023 Each and every single one of y'all will die in the name of Salvador I have a whole clown crew waiting for my signal to start the plan</i>
3	On or about May 21, 2023	Instagram Account @pilon_gaby	Texas Children's Hospital	<i>Your childrens hospital may blow in pieces If yall dont do as i say</i>
4	On or about May 22, 2023	Instagram Account @pilon_gaby	Uvalde Radio	<i>We Clowns will shoot uvalde high school and blow up memorial hospital.</i>
5	On or about September 28, 2023	schoolshooter7878@gmail.com	Uvalde CISD	<i>Ohh can I tell you that there will be bombs at the uvalde memorial hospital O shit I just spoiled one of them surprises</i>

Count	Date	Communication Method	Recipient	Threat
6	On or about September 30, 2023	schoolshooter7878@gmail.com	Uvalde City Hall	<i>We will shoot Uvalde Texas high school an Texas A&M college This shit will happen even if I die</i>
7	On or about October 2, 2023	Kick.com account shooter_2022	Kick.com users	<i>We will shoot Uvalde Texas high school and Texas A&M college.</i>
8	On or about October 2, 2023	Kick.com account killer_22	Kick.com users	<i>We will shoot Uvalde Texas high school and Texas A&M college</i>
9	On or about October 17, 2023	schoolshooter7878@gmail.com	Uvalde CISD	<i>Imma stop threatening and opening my thoughts and start to take action of my sayings I won't regret nothing that happens over there They will shoot uvalde high school and morales jr high whenever I tell 'em So yeah the persecution is gonna start today</i>
10	On or about October 25, 2023	schoolshooter7878@gmail.com	Uvalde City Hall	<i>They will shoot Uvalde high school and morales jr high whenever I tell 'em So yeah the persecution is gonna start today</i>
11	On or about October 25, 2023	schoolshooter7878@gmail.com	Uvalde CISD	<i>If Mata Rubio wins the elections I will kill her</i>
12	On or about October 25, 2023	Facebook account Gabriela Morales (61552295398566)	Atascosa County Juvenile Justice Center's	<i>Y'all treated me like shit and for that all of you are going to pay We will shoot uvalde texas high school, Texas A&M and blow ACJJC the fuck up to the sky I will not regret none of the losses y'all can experience Se y'all on the news</i>
13	On or about October 28, 2023	Facebook account Gabriela Morales (61552295398566)	Zavala County Sheriff's Office	<i>We will shoot uvalde texas high school</i>

Each count listed above constitutes a separate and distinct violation of 18 U.S.C. § 875(c).

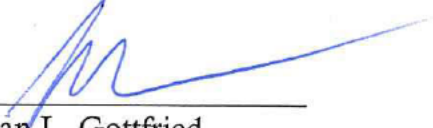
TRUE BILL



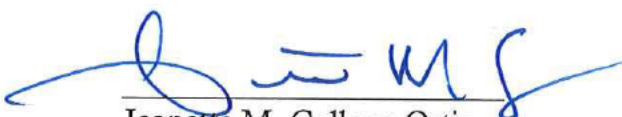
FOREPERSON

Date: 11/29/23

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